

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM INTERNATIONAL SURVEILLANCE
SERVICES CORPORATION'S APPEARANCE AT THE MAY
18-19, 2022, OMNIBUS HEARING**

TO THE HONORABLE COURT:

COMES NOW INTERNATIONAL SURVEILLANCE SERVICES CORPORATION,

("ISSC"), defendant in Adversary Case No. 19-00202-LTS (the "Action"), and a party-in-

interest under 11 U.S.C. § 1109(b), by and through the undersigned legal counsel, and

respectfully submits this motion in compliance with the Court's Order Regarding Procedures

for May 18-19, 2022, Omnibus Hearing (Dkt. No. 20687) (the "Scheduling Order"):

1. Nelson Robles Diaz of Nelson Robles Diaz Law Offices P.S.C., will appear on

behalf of ISSC at the May 18-19, 2022, omnibus hearing (the "Hearing"), which will

be conducted virtually via videoconferencing (Zoom) and telephonic platforms.

1. The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. The email address of Mr. Robles is nroblesdiaz@gmail.com. Further, Mr. Robles hereby submits his Party Appearance Cover Sheet as **Exhibit A** to this motion.
3. Mr. Robles may present oral argument related to the following pleadings:
 - a. *Motion by the Avoidance Actions Trustee to Establish Litigation Case Management Procedures* (Dkt. No. 20560);
 - b. *Motion to file Instanter ISSC's Motion in Partial Opposition to Avoidance Actions Trustee's Proposed Litigation Case Management Procedure, as filed in Adversary Proceeding 19-00202* (Dkt. No. 20674);
 - c. *Any other responses or motions related to the foregoing.*
4. ISSC further reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board by May 16, 2022, or to address any statement or issue that may be raised by any party at the Hearing related to the Title III cases, the Action, or any other proceeding which may affect the interests of ISSC.

WHEREFORE, ISSC respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of May 2022.

CERTIFICATE OF SERVICE: I hereby certify that the foregoing motion was filed with the clerk of the United States District Court for the District of Puerto Rico electronically using the CM/ECF system, which automatically serves notification of the filing to all parties in interest.

Nelson Robles Díaz
NELSON ROBLES-DIAZ LAW OFFICES, P.S.C.
SDCPR NO. 204410
Counsel for Defendant International Surveillance Services Corporation

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EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party International Surveillance Services Corporation	
Party Name Abbreviation (For Use with Zoom)	ISSC
<p>Confirmation Hearing Participants</p> <p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney’s Notice of Appearance • Zoom Screen Name (<u>See</u> December Omnibus Hearing procedures Order, ¶ 8(a)) <p>Nelson Robles Diaz nroblesdiaz@gmail.com Nelson Robles Diaz Law Offices PSC 787-294-9518; 787-370-4172 Docket Entry: 20674 ISSC / Nelson Robles / Nelson Robles Diaz Law Offices PSC</p>	
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a “Supplemental” Party Appearance Sheet.	
<p>Note: Pursuant to the December Omnibus Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.</p>	